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Chapter 11

8 Attorneys for Karen L. Easterday individually and
9 as personal representative of the estate of Gale A.
10 Easterday

11 UNITED STATES BANKRUPTCY COURT
12 EASTERN DISTRICT OF WASHINGTON

13 In re
14 EASTERDAY RANCHES, INC., *et al.*
15 Debtors¹.

Chapter 11

Lead Case No. 21-00141-WLH
Jointly Administered

16 EASTERDAY RANCHES, INC. and
17 EASTERDAY FARMS,

Plaintiffs,

v.

18 ESTATE OF GALE A. EASTERDAY
19 (DECEASED), KAREN L. EASTERDAY,
20 CODY A. EASTERDAY, and DEBBY
EASTERDAY,

Defendants.

Adv. Pro No. 21-80050 (WLH)

**STIPULATED MOTION TO
INDEFINITELY EXTEND
DEFENDANTS' DEADLINE
TO FILE MOTION OR
ANSWER COMPLAINT**

STIPULATION

23 Easterday Ranches, Inc.; Easterday Farms (together "Plaintiffs"); Estate of
24 Gale L. Easterday; Karen L. Easterday; Cody A. Easterday; and Debby Easterday
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26 ¹ This case is jointly administered with *In re Easterday Farms*, Case No. 21-00176-WLH11.

**STIPULATED MOTION TO INDEFINITELY EXTEND DEFENDANTS' DEADLINE
TO FILE MOTION OR ANSWER COMPLAINT - 1**

1 (“Defendants” and, together with Plaintiffs, the “Parties”), by and through their
2 counsel of record, hereby stipulate as follows:

3 1. Plaintiffs filed their complaint in the above-captioned action on
4 September 22, 2021 (the “Complaint”) [Doc. No. 1].

5 2. On that same day, the Court served a Summons in an Adversary
6 Proceeding (“Summons”), which Summons set Defendants’ deadline to file a
7 motion or answer to the Complaint within 30 days of September 22, 2021
8 [Doc. No. 3].

9 3. Plaintiffs and Defendants hereby agree that Defendants’
10 aforementioned deadline to file a motion or answer to the Complaint is stayed
11 indefinitely.

12 4. If and when Plaintiffs desire Defendants to file a motion or answer to
13 the Complaint, Plaintiffs will provide written notice to Defendants’ counsel via
14 email, which notice shall trigger a 14-day deadline for Defendants to file a motion
15 or answer to the Complaint.

16 Dated: October 19, 2021.

17 IT IS SO STIPULATED:

18 TONKON TORP LLP

19 By /s/ Timothy J. Conway
20 Timothy J. Conway, WSBA 52204
21 Attorneys for Karen L. Easterday
22 individually and as personal
23 representative of the estate of Gale A.
24 Easterday
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STIPULATED MOTION TO INDEFINITELY EXTEND DEFENDANTS’ DEADLINE
TO FILE MOTION OR ANSWER COMPLAINT - 2

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13 *Debtors-in-Possession*

14 SUSSMAN SHANK

15 By /s/ Jeffrey C. Misley
16 Jeffrey C. Misley, WSBA #33397
17 *Attorneys for Cody and Debby Easterday*

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STIPULATED MOTION TO INDEFINITELY EXTEND DEFENDANTS' DEADLINE
TO FILE MOTION OR ANSWER COMPLAINT - 3